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11 IN THE UNITED STATES DISTRICT COURT
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13 EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
15 v.
16 MICHAEL GARCIA,
also known as "Smokes,"
NANCY DALILA GARCIA ESCOBAR, and
TYLOR JEFFERY COMBS,
17 Defendants.

CASE NO. 2:20-CR-0181 JAM
STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER
DATE: April 20, 2021
TIME: 9:30 a.m.
COURT: Hon. John A. Mendez

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19 STIPULATION

- 20 1. By previous order, this matter was set for status on April 20, 2021.
21 2. By this stipulation, defendants now move to continue the status conference until June 29,
22 2021, and to exclude time between April 20, 2021, and June 29, 2021, under Local Code T4.
23 3. The parties agree and stipulate, and request that the Court find the following:
24 a) The government has represented that the discovery associated with this case
25 includes over 50 gigabytes of evidence in electronic form, including multiple hours of covert
26 recordings, pictures, investigative reports, and related documents. A second batch of discovery
27 was recently produced to the defendants. All of this discovery has been either produced directly
28 to counsel and/or made available for inspection and copying.

1 b) Mr. Clemente Jimenez was recently appointed as new counsel for defendant Tylor
2 Combs. ECF No. 63.

3 c) Counsel for defendants desire additional time to consult with their clients, review
4 the discovery, conduct investigation and research related to the charges, to review and copy
5 discovery for this matter, to discuss potential resolutions with their clients, and to otherwise
6 prepare for trial.

7 d) Counsel for defendants believe that failure to grant the above-requested
8 continuance would deny them the reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence.

10 e) The government does not object to the continuance.

11 f) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of April 20, 2021 to June 29, 2021,
16 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
17 because it results from a continuance granted by the Court at defendant's request on the basis of
18 the Court's finding that the ends of justice served by taking such action outweigh the best interest
19 of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: April 12, 2021

PHILLIP A. TALBERT
Acting United States Attorney

Dated: April 12, 2021

/s/ LEXI P. NEGIN
LEXI P. NEGIN
Counsel for Defendant
MICHAEL GARCIA

Dated: April 12, 2021

/s/ MICHAEL D. LONG
MICHAEL D. LONG
Counsel for Defendant
NANCY DALILA GARCIA ESCOBAR

Dated: April 12, 2021

/s/ CLEMENTE M. JIMENEZ
CLEMENTE M. JIMENEZ
Counsel for Defendant
TYLOR JEFFERY COMBS

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 12th day of April, 2021.

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE